

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

STATE OF DELAWARE, *ex rel.*  
KATHLEEN JENNINGS, Attorney General of  
the State of Delaware,

Plaintiff,

v.

BP AMERICA INC., BP P.L.C., CHEVRON  
CORPORATION, CHEVRON U.S.A. INC.,  
CONOCOPHILLIPS, CONOCOPHILLIPS  
COMPANY, PHILLIPS 66, PHILLIPS 66  
COMPANY, EXXON MOBIL  
CORPORATION, EXXONMOBIL OIL  
CORPORATION, XTO ENERGY INC., HESS  
CORPORATION, MARATHON OIL  
CORPORATION, MARATHON OIL  
COMPANY, MARATHON PETROLEUM  
CORPORATION, MARATHON  
PETROLEUM COMPANY LP, SPEEDWAY  
LLC, MURPHY OIL CORPORATION,  
MURPHY USA INC., ROYAL DUTCH  
SHELL PLC, SHELL OIL COMPANY,  
CITGO PETROLEUM CORPORATION,  
TOTAL S.A., TOTAL SPECIALTIES USA  
INC., OCCIDENTAL PETROLEUM  
CORPORATION, DEVON ENERGY  
CORPORATION, APACHE CORPORATION,  
CNX RESOURCES CORPORATION,  
CONSOL ENERGY INC., OVINTIV, INC.,  
and AMERICAN PETROLEUM INSTITUTE,

Defendants.

C.A. No. 20- 1429-LPS

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission *pro hac vice* of David C. Frederick, Brendan J. Crimmins, Daniel Severson and Grace W. Knofczynski of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C., 1615 M Street, N.W., Suite

400, Washington, D.C. 20036 to represent defendants Royal Dutch Shell plc and Shell Oil Company in this matter.

Dated: November 2, 2020

**K&L GATES LLP**

/s/ Steven L. Caponi

Steven L. Caponi (No. 3484)  
Matthew B. Goeller (No. 6283)  
600 N. King Street, Suite 901  
Wilmington, DE 19801  
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matthew.goeller@klgates.com

*Attorneys for Defendants Royal Dutch  
Shell plc and Shell Oil Company*

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED that counsel's motion for admission *pro hac vice* of David C. Frederick, Brendan J. Crimmins, Daniel Severson and Grace W. Knofczynski is granted.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the District of Columbia and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective July 23, 2009, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's Office upon the filing of this motion.

Dated: November 2, 2020

/s/ David C. Frederick  
David C. Frederick  
KELLOGG, HANSEN, TODD,  
FIGEL & FREDERICK, P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, D.C. 20036  
Phone: (202) 326-7900  
dfrederick@kellogghansen.com

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Dated: November 2, 2020

/s/ Brendan J. Crimmins  
Brendan J. Crimmins  
KELLOGG, HANSEN, TODD,  
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1615 M Street, N.W., Suite 400  
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Dated: November 2, 2020

/s/ Daniel S. Severson

Daniel Severson  
KELLOGG, HANSEN, TODD,  
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Dated: November 2, 2020

/s/ Grace W. Knofczynski  
Grace W. Knofczynski  
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